

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re A.W., a minor, by and through his :  
natural guardian, K.W., :  
In re J.H., a minor, by and through his :  
natural guardian, V.H., :  
In re Q.W., a minor, by and through his :  
natural guardian, B.R., :  
In re M.A., a minor, by and through her :  
natural guardian, A.A., :  
In re D.F., a minor, by and through her :  
natural guardian, D.J.F., and :  
In re T.R., by and through his natural :  
guardian, D.M., :

Plaintiffs,

v.

WOODLAND HILLS SCHOOL :  
DISTRICT, CHURCHILL BOROUGH, :  
DYNASTY SECURITY, KEVIN :  
MURRAY, STEPHEN SHAULIS, ALAN :  
JOHNSON, CHRIS LEWANDOWSKI, :  
PATRICK SCOTT, JOSEPH GOLDEN :  
and JOHN DOE. :

Defendants.

No. 2:17-CV-01112-DSC

**SECOND AMENDED COMPLAINT**

**JURY TRIAL DEMANDED**

**PETITION PURSUANT TO LOCAL RULE 17.1 FOR LEAVE TO SETTLE MINOR'S  
CLAIM**

AND NOW comes the Petitioner, V.H., guardian and natural mother of her minor child, J.H. by and through her attorney, Timothy P. O'Brien, Esquire, and petitions this Court for leave to settle the minor's claims arising from an incident, the facts and alleged details of which are more fully set forth in the Plaintiff's Second Amended Complaint.

1. The minor plaintiffs' date of birth is January 13, 2002.
2. The minor Plaintiff's allegations are as follows: While he was a student at Woodland Hills High School he was assaulted and physically threatened by the school

principal, Defendant Kevin Murray. Defendant Murray threatened to “knock his teeth out” and then lie about it under oath. The minor plaintiff recorded these threats on his cell phone. Defendants Murray and Shaulis attempted to destroy the audio recording by deleting the minor plaintiff’s cell phone. The recording was saved only because the minor plaintiff had sent it to his mother who retained it. The minor Plaintiff and his mother reported this incident to Defendants Woodland Hills High School and Churchill Borough. Neither defendant took any action against Defendants Murray or Shaulis, who went on to assault other students including other Plaintiffs in this lawsuit. The minor plaintiff suffered emotional injuries as a result of Defendants’ conduct. Defendants contest these allegations.

3. In accordance with ongoing settlement negotiations, of which this Court was notified, the parties have agreed to a settlement of the minor Plaintiff’s claims for the sum of \$50,000. No attorney’s fees and/or costs will be deducted from the settlement amount, as any and all costs and attorney’s fees will be paid from a separate fund agreed to by the above-captioned parties

4. It is the opinion of the undersigned counsel for the plaintiff, and the considered opinion of V.H., the minor plaintiff’s parent and guardian that the foregoing settlement is fair reasonable.

5. The sum of \$50,000 recovered on behalf of the minor plaintiff will be distributed and made payable to V.H., as Parent and Guardian on behalf J.H., a minor . Such sum to be deposited into an interest-bearing account with withdrawals only upon court approval until the minor reaches age of majority, (proof of deposit to be filed with this court within 30 days of receipt of the settlement funds).

WHEREFORE, the petitioner, V.H. requests this Honorable Court to enter an order approving the settlement of the minor's claim for the sum of \$50,000 r and accordingly directing the distribution of the proceeds of this settlement as set forth in Paragraph 5 of this petition.

Respectfully submitted,

/s/ Timothy P. O'Brien  
Timothy P. O'Brien  
Law Offices of Timothy P. O'Brien  
239 Fourth Avenue  
Suite 2103, Investment Building  
Pittsburgh, PA 15222

(412) 232-4400  
(412) 232-3730 (fax)

Attorney for petitioner